REMARKS

Applicants thank the Examiner for indicating that claims 23 and 30 would be allowable if rewritten in independent form to include all limitations of any intervening claims.

Claims 16-17, 22, 24, 29, and 31 are pending in the application. Claims 16 and 24 are independent. By the foregoing Amendment, claims 16, 22, 24, and 29 have been amended and claims 1, 13-15, 20-21, 23, 27-28, and 30 have been canceled. These changes are believed to introduce no new matter and their entry is respectfully requested.

Rejection of Claims 1, 13-17, 20, 24, 27, and 31 Under 35 U.S.C. §102(e)

In the Office Action, the Examiner rejected claims 1, 13-17, 20, 24, 27, and 31 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,721,464 to Pain et al. (hereinafter *"Pain"*). Applicants respectfully traverse the rejection.

A claim is anticipated only if each and every element of the claim is found, either expressly or inherently, in a reference. (MPEP §2131 *citing Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628 (Fed. Cir. 1987)). The identical invention must be shown in as complete detail as is contained in the claim. Id. *citing Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989)). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

Regarding independent claim 16 and with reference to independent claim 1, in the Office Action, the Examiner states that *Pain* discloses an active pixel sensor having a sensor PD for producing a sensor potential, a pull-down circuit 1150 for implementing a pull-down function during which the sensor potential is pulled down to a hard reset level, a reset voltage coupled to the pull-down circuit, and a reset transistor coupled between the reset voltage line and the sensor, wherein during the pull-down function the reset transistor is conducting and the pull-down circuit operates to pull down the sensor potential below the selected critical level, the pull-down function (hard reset) being performed prior to a soft reset when the sensor potential is reset to a selected (hard reset) level. Regarding independent claim 16, in the Office Action, the Examiner

states that the method claim is also met by the analysis of claim 1. Applicants respectfully disagree.

In the Office Action, the Examiner indicated that claim 23 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Although Applicants believe claim 16 is patentable as written, in the interest of expediting prosecution Applicants have amended claim 16 to include the subject matter of claims 20-21 and 23. Accordingly, Applicants respectfully submit that claim 16 is now in condition for allowance.

Claims 1, 13-15, and 20, have been canceled and the rejection of them is rendered moot. Claims 17 properly depends from claim 16 and is thus patentable for at least the same reasons that claim 16 is patentable.

Regarding independent claim 24 1, in the Office Action, the Examiner states that *Pain* discloses an active pixel sensor in which a soft reset function is performed, the active pixel sensor circuit comprising a sensor (photodiode PD) which outputs a sensor potential, a reset transistor (the transistor coupled to the RST line) coupled to the sensor, and a bitline (Pix-Out) coupled through a plurality of transistors to the sensor, wherein the sensor potential is pulled below a selected critical level (by virtue of hard-reset) prior to the time when a soft reset function is performed to reset the sensor potential. Applicants respectfully disagree.

In the Office Action, the Examiner indicated that claim 30 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Although Applicants believe claim 24 is patentable as written, in the interest of expediting prosecution Applicants have amended claim 24 to include the subject matter of claims 27-28 and 30. Accordingly, Applicants respectfully submit that claim 24 is now in condition for allowance.

Claims 29 and 31 properly depend from claim 24 and are thus patentable for at least the same reasons that claim 24 is patentable. (MPEP §2143.03 (citing *In re Fine*, 837 F.2d 1071, 5

USPQ2d 1596 (Fed. Cir. 1988)). Accordingly, Applicants respectfully request that the Examiner reconsider and remove the rejection to claims 1, 13-17, 20, 24, 27, and 31.

<u>Rejection of Claims 21-22 and 28-29 Under 35 U.S.C. §103(a)</u>

In the Office Action, the Examiner rejected claims 21-22 and 28-29 under 35 U.S.C. §103(a) as being obvious over *Pain* in view of U.S. Patent No. 6,917,027 to Krymski (hereinafter "*Krymski*"). Applicants respectfully traverse the rejection.

Claim 21 has been canceled rendering the rejection to it moot. Claim 22 properly depends from claim 16 and is thus patentable for at least the same reasons that claim 16 is patentable. Claim 28 has been canceled rendering the rejection to it moot. Claim 29 properly depends from claim 24 and is thus patentable for at least the same reasons that claim 24 is patentable. (MPEP §2143.03 (citing *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988)). Accordingly, Applicants respectfully request that the Examiner reconsider and remove the rejection to claims 21-22 and 28-29.

CONCLUSION

Applicants respectfully submit that all grounds for rejection have been properly traversed, accommodated, or rendered moot and that the application is now in condition for allowance. The Examiner is invited to telephone the undersigned representative if the Examiner believes that an interview might be useful for any reason.

Respectfully submitted,

BLAKELY SOKOLOFF TAYLOR & ZAFMAN LLP

_____/July14, 2008/_____   _____/Jan Little-Washington/_____

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CERTIFICATE OF MAILING/TRANSMISSION

I hereby certify that this correspondence is being submitted electronically via EFS-Web on the date shown below.

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_____

Steven E. Welch   *July 14, 2008*